

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

ANDREW L. SMITH

PLAINTIFF

V.

CASE NO.: 3:13-CV-696-HTW-LRA

**CITY OF GRENADA &
MISSISSIPPI DEVELOPMENT AUTHORITY**

DEFENDANTS

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANT'S MOTION TO DISMISS**

COMES NOW the Plaintiff by and through counsel, and files this his Motion for Extension of Time to Respond to Defendant's Motion to Dismiss, and in support thereof would show the following:

1. On December 10, 2013, the Defendant Mississippi Development Authority filed its Motion to Dismiss.
2. Plaintiff's response to the Defendant's Motion for Summary Judgment is due on December 27, 2013.
3. Plaintiff is requesting an additional seven (7) days to complete his response to Defendant's Motion to Dismiss
4. Plaintiff is requesting this extension because Plaintiff's counsel will be on vacation for the Christmas holidays until December 30. Plaintiff has attempted to contact Defendant about the requested extension, but was not able to get in contact with them.
5. This request is not made for the purposes of delay.

WHEREFORE PREMISES CONSIDERED, Plaintiff respectfully requests that the Court extend the time for Plaintiff to respond to Defendant's Motion to Dismiss through and

until January 3, 2014.

THIS, the 24th day of December 2013.

Respectfully submitted,
PLAINTIFF

/s Nick Norris
LOUIS H. WATSON, JR. (MB# 9053)
NICK NORRIS (MB# 101574)
Attorneys for Plaintiff

OF COUNSEL:

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CERTIFICATE OF SERVICE

I, Nick Norris, attorney for the Plaintiff, do hereby certify that I have this day served via ECF filing or by United States mail, postage prepaid, a true and correct copy of the above and foregoing document to all counsel of record:

THIS, the 24th day of December, 2013.

/s Nick Norris
NICK NORRIS